

CONNECTICUT CAMPING ASSOCIATION

The Voice of Organized Camping in Connecticut Since 1965

www.ctcamps.org

Senator Anwar, Representative Linehan, and members of the Committee on Children:

My name is Keith Garbart and I am speaking on behalf of the Connecticut Camping Association (CCA) in regard to H.B 6417 "An Act Requiring Background Checks for Certain Employees of Licensed Youth Camps." The CCA is in favor of comprehensive background checks for all camp staff but are opposed to the language in the proposed bill as written as part of a comprehensive background check that includes FBI Fingerprinting.

First and foremost, the safety of our campers is of the utmost importance to the Connecticut Camping Association (CCA). The CCA is not opposed to background checks, as most youth camps currently do them; especially those that are American Camp Association (ACA) Accredited Camps, such as: YMCA Camps, and Boy and Girl Scout Camps, as well as many others. The safety and well-being of our campers is our number one priority!

We do feel, however, that asking camp staff to submit to an FBI Fingerprint Background check is not necessarily the best way to go about this under the current circumstances of reasonable cost and timely response. We feel the process of the fingerprint background check is unrealistic with the hiring manner seasonal summer camps tend to follow. Most camps are hiring staff almost up until the first day of staff training and under the proposed legislation that staff member would not be able to work until the background check is 100% complete. With the rollout of fingerprinting for youth camps that participate in the Care 4 Kids program, there have been circumstances in which fingerprint background check processing has taken upwards of two months. In addition, many are being returned with "smudging" or other problems experienced during the fingerprint process that were submitted way back in November in some cases. Considering there are approximately 16,000 seasonal employees working at summer camps across Connecticut at over 500 licensed camps it is easy to understand how this could potentially be a huge problem. In addition, how would international staff be handled as typically they are not even in the country until a week or two before camp begins and this will lead to a major problem in processing that many applicants in a timely and efficient manner. Also, this is another group of staff that already go through a rigorous background check through their sponsoring organization and must obtain a J-1 visa prior to even entering the country.

The CT Camping Association does feel that the third-party companies that are currently conducting background checks for camps throughout the country are accurate, dependable, and achieve the same result in a timely manner. These third-party

companies check state and national databases for criminal convictions based on name, social security number, birthdate, and addresses lived at in the past 7-10 years, in most cases. Also investigated is a thorough review of the National Sex Offender Registry public website. These companies provide full reports for all potential staff members checked and if anything is listed, a follow up check or in-depth search can be conducted as required. If we are required to move to fingerprint background checks camps will have to decide either to cover the cost themselves or pass it on to the potential staff member.

Here is what is required of a camp that is American Camp Association Accredited according to the 2019 standards which are the latest update to the standards as of October of 2019. The following standards are considered **MANDATORY** Standards and compliance with a **MANDATORY** Standard is required for accreditation to be granted, regardless of scores achieved on other areas:

AD.25 New Staff Screening (Year-Round and Seasonal) Does the camp require screening for all new camp staff based on camp property (directors, counselors, administrative, and support staff; seasonal and year-round staff members; and paid, volunteer, and contracted personnel) that includes:

AD.25.1 A criminal background check for staff eighteen years of age and older?

AD.26 Subsequent Criminal Background Checks Does the camp require a criminal background check for returning and year-round camp staff based on camp property (directors, counselors, administrative and support staff; seasonal and year-round staff members; and paid, volunteer, and contracted personnel) in the following time frames:

AD.26.1 For returning seasonal staff, an annual criminal background check for staff eighteen (18) years of age and older to be initiated prior to the arrival of campers or prior to the start of employment for any late hires?

AD.26.2 For year-round staff: A criminal background check for staff eighteen (18) years of age and older at least every five years?

AD.27 Annual Staff Screening Does the camp require annual screening for all camp staff (18 and older) based on camp property (directors, counselors, administrative, and support staff; seasonal and year-round staff members; and paid, volunteer, and contracted personnel) that includes:

AD.27.1 A disclosure statement?

AD.27.2 A check of the National Sex Offender Public website or verification that a check of the sex offender registry of all fifty (50) states has been completed?

The above Standards are all **MANDATORY STANDARDS** for Accreditation and all camps must answer this question with a **YES** and have a policy in place and show records that they are being completed, you cannot take a **NO** on a mandatory standard or you will not be accredited. The ACA does give guidelines for acceptable background checks but does not specifically require a camp to do a specific check to comply with the standard. The ACA does consider third party database background checks to be acceptable for all the above standards. ACA does stipulate though,

that any camp must follow any state laws that are required. So, if CT does require, by statute, for fingerprint background checks then that will be what is expected to follow this standard. We hope that the ACA Standards can be looked at and considered as acceptable guidelines for “comprehensive background checks,” and that language can be changed to reflect this in the proposed legislation.

In conclusion, we reiterate that the CT Camping Association is in favor of background checks for all youth camps. Camper safety is our highest priority, and this will always be in the fore front of our minds when considering this topic. We do feel the background checks currently being used for Accredited American Camp Association Camps, YMCA’s of CT and Boy and Girl Scouts Camps meet the same level of standards as outlined in this proposal. Those camps all choose to do background checks that are name based, social security number, birth date, and residence verification along with the National Sex Offender Public website check. We feel that, while there has been progress in the area of FBI Fingerprint Background checks, the system as proposed remains unworkable for seasonal summer camp employees because it is not a reasonable cost or done within a timely manner.

We feel youth camps are continually being shoehorned into the same licensing as childcare centers and there are many distinct differences. It is not as simple as what applies for one should apply for the other. We are different and should be treated as such. Since licensing for youth camps was moved from the Department of Public Health to the Office of Early Childhood we have been fighting this battle of what summer camp is and we feel we need to continue to educate the OEC on that topic to help both parties understand each other. This is simply another case of a good idea not being executed the correct way. We are very willing to work with the Office of Early Childhood and the Committee on this very important topic of background checks and ask that we are part of the conversation moving forward. We feel all camps in Connecticut should be held to the same standard and are always looking out for the best interest of the children.

Thank you for taking the time to consider our position and we look forward to a healthy conversation about this topic and how, together, we can help develop language around background checks that make sense for everyone.

I appreciate your time and we are more than willing to answer any questions regarding this topic or provide further information. I can be reached by email at

keith@windingtrails.org or by phone at (860) 677-8458 ext. 14. Thank you for your time and consideration.

Respectfully Submitted,

Keith Garbart

Keith Garbart
Connecticut Camping Association

